

*United States Attorney
Southern District of New York*

March 25, 2022

BY ECF

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Brian Kolfage and Timothy Shea*, 20 Cr. 412 (AT)

Dear Judge Torres:

The Government respectfully submits this letter to advise the Court that defendants Brian Kolfage and Timothy Shea have reached agreements in principle with the Government to enter pleas of guilty to certain charges in this case and to the charges currently pending against Kolfage in the Northern District of Florida (which will be transferred to this Court pursuant to Rule 20 of the Federal Rules of Criminal Procedure), rendering unnecessary the trial presently scheduled for May 16, 2022. The parties are in the process of formalizing their agreements and will submit executed copies thereof to the Court as soon as possible. In light of these developments, the parties jointly request that the Court adjourn *sine die* the parties' pretrial filing deadlines presently set for March 28, 2022, and April 4, 2022, and schedule change of plea hearings for both defendants—during the week of March 28, 2022 for Shea and during the week of April 11, 2022 for Kolfage. Kolfage and Shea both request, without objection from the Government, that the change of plea hearings be held remotely.

Respectfully submitted,

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